

ERIC L. CRAMER (*pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
ecramer@bm.net

JOSEPH R. SAVERI (*pro hac vice*)
JOSEPH SAVERI LAW FIRM, LLP
601 California Street, Suite 1000
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
jsaveri@saverilawfirm.com

RICHARD A. KOFFMAN (*pro hac vice*)
COHEN MILSTEIN SELLERS & TOLL, PLLC
1100 New York Ave., N.W.,
Suite 500, East Tower
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408 4699
rkoffman@cohenmilstein.com

*Counsel for the Class and Attorneys for All
Individual and Representative Plaintiffs*

[Additional Counsel Listed on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF JOSEPH R.
SAVERI IN SUPPORT OF PLAINTIFFS'
MOTIONS IN LIMINE NOS. 13 TO 17
TO EXCLUDE UNFAIRLY
PREJUDICIAL, IRRELEVANT, OR
UNSUBSTANTIATED EVIDENCE OR
TESTIMONY RELATING TO ZUFFA
OR THE UFC**

1 I, Joseph R. Saveri, Esq., declare and state as follows:

2 1. I am the founder of the Joseph Saveri Law Firm, LLP and one of the Court
3 appointed Co-Lead Class Counsel to represent the Bout Class in Le v. Zuffa, LLC, No. 2:15-cv-
4 1045 (D. Nev.). I am a member in good standing of the California bar and have been admitted
5 pro hac vice in this Court. I am over 18 years of age and have personal knowledge of the facts
6 stated in this Declaration. If called as a witness, I could and would testify competently to them. I
7 make this declaration pursuant to 28 U.S.C. § 1746.

8 2. Attached as **Exhibit N** is a true and correct copy of excerpts of the August 9, 2017
9 deposition of Dana White.

10 3. Attached as **Exhibit O** is a true and correct copy of excerpts of the December 2, 2016
11 30(b)(6) deposition of Deposition of Lawrence Epstein.

12 4. Attached as **Exhibit P** is a true and correct copy of a document produced by Defendant
13 Zuffa in this matter, bates stamped ZFL-1240584-1240591, entitled “Zuffa, LLC Intangible Asset
14 Treatment Discussion Memo.”

15 5. Attached as **Exhibit Q** is a true and correct copy of a document produced by Defendant
16 Zuffa in this matter, bates stamped ZUF-00031544-00031545

17 6. Attached as **Exhibit R** is a true and correct copy of a document produced by Defendant
18 Zuffa in this matter, bates stamped ZFK-2193553.

19 7. Attached as **Exhibit S** is a true and correct copy of Defendant Zuffa’s proposed trial
20 exhibit DX-794.

21 8. Attached as **Exhibit Z** is a compilation of tables that Plaintiffs’ counsel prepared
22 pertaining to the 85 video and audio files that Zuffa proposed as trial exhibits on its February 8,
23 2024 trial exhibit list:

- 24 a. **Z-1** lists all eighty-five proposed video and audio files.
25 b. **Z-2** lists fifteen clips that do not appear to have been created by Zuffa.
26 c. **Z-3** lists fifty-six clips that feature individuals not on the parties’ witness lists.
27
28

- d. **Z-4** lists twenty-five clips featuring fighters subject to Plaintiffs' MIL No. 1 regarding untimely disclosed witnesses.
- e. **Z-5** lists eighteen clips that were only produced in *Johnson, et al. v. Zuffa, LLC*, No. 2:21-cv-01189-RFB-BNW.
- f. **Z-6** lists nineteen clips produced in neither this matter nor *Johnson*.
- g. **Z-7** lists three clips that pertain to matters which are the subject of Plaintiffs' MIL No. 18, i.e., regarding events that took place prior to 2005 and on which Zuffa did not participate in discovery.
- h. **Z-8** lists clips that appear to be the subject of PMIL No. 13 regarding charitable contributions by Zuffa.

I declare under penalty of perjury and the laws of the United States that the foregoing is true and correct. This Declaration was executed in San Francisco, California on February 29, 2024.

Dated: February 29, 2024

By: /s/ Joseph R. Saveri

Joseph R. Saveri (*admitted pro hac vice*)
 Kevin E. Rayhill (*admitted pro hac vice*)
 Christopher K. L. Young (*admitted pro hac vice*)
 Itak Moradi (*admitted pro hac vice*)
 JOSEPH SAVERI LAW FIRM, LLP
 601 California St., Suite 1000
 San Francisco, CA 94108
 Telephone: +1 (415) 500-6800
 Facsimile: +1 (415) 395-9940
 Email: jsaveri@saverilawfirm.com
 Email: krayhill@saverilawfirm.com
 Email: cyoung@saverilawfirm.com
 Email: imoradi@saverilawfirm.com

Eric L. Cramer (*admitted pro hac vice*)
 Michael Dell'Angelo (*admitted pro hac vice*)
 Patrick F. Madden (*admitted pro hac vice*)
 Ellen Noteware (*admitted pro hac vice*)
 Najah Jacobs (*admitted pro hac vice*)
 BERGER MONTAGUE PC

1818 Market St., Suite 3600
Philadelphia, PA 19103
Telephone: +1 (215) 875-3000
Email: ecramer@bm.net
Email: mdellangelo@bm.net
Email: pmadden@bm.net
Email: enoteware@bm.net
Email: njacobs@bm.net

Joshua P. Davis (admitted *pro hac vice*)
BERGER MONTAGUE PC
505 Montgomery Street, Suite 625
San Francisco, CA 94111
Telephone: +1 (415) 906-0684
Email: jdavis@bm.net
Richard A. Koffman (*pro hac vice*)
Benjamin Brown (*pro hac vice*)
Daniel H. Silverman (*pro hac vice*)

COHEN MILSTEIN SELLERS & TOLL, PLLC
1100 New York Ave., N.W., Suite 500 East, Tower
Washington, DC 20005
Telephone: +1 (202) 408-4600
Facsimile: +1 (202) 408-4699
Email: rkoffman@cohenmilstein.com
Email: bbrown@cohenmilstein.com
Email: dsilverman@cohenmilstein.com

*Co-Lead Counsel for the Class and Attorneys for
Individual and Representative Plaintiffs*

Don Springmeyer (Bar No. 1021)
KEMP JONES, LLP
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169
Telephone: + 1 (702) 385-6000
Facsimile: + 1 (702) 385-6001
Email: dspringmeyer@kempjones.com

*Liaison Counsel for the Class and Attorneys for
Individual and Representative Plaintiffs*

Robert C. Maysey (*pro hac vice*)
Jerome K. Elwell (*pro hac vice*)
WARNER ANGLE HALLAM JACKSON &
FORMANEK PLC
2555 E. Camelback Road, Suite 800
Phoenix, AZ 85016
Telephone: +1 (602) 264-7101

Facsimile: +1 (602) 234-0419
Email: rmaysey@warnerangle.com
Email: jelwell@warnerangle.com

Crane Pomerantz (Bar No. 14103)
CLARK HILL PLC
1700 S. Pavilion Center Drive
Suite 500
Las Vegas, NV 89135
Telephone: +1 (702) 697-7545
Email: cpomerantz@clarkhill.com

*Counsel for the Class and Attorneys for Individual
and Representative Plaintiffs.*